

## INCIDENT REPORTING & COMPLIANCE RESPONSE

<b>From: FMIT</b> Environmental Protection Office 500 Merriman Ave. Needles, CA 92363	<b>Fort Mojave Indian Tribe</b> <b>Environmental Protection Office</b> <b>Environmental Operations Manager</b> <b>500 Merriman Ave.</b> <b>Needles, CA. 92363</b> <b>760-326-9650 Cell: 805-217-1999</b>	<b>Documentation No.</b> Date: 8-1-2013 Time: 0930 Incident: LUST, premium gas storage at Fort Mojave Gas Station
<b>PRIORITY ONE:</b> <input type="checkbox"/> Possible Threat to Health or Life Notified: <input type="checkbox"/> <sup>1</sup> EPA <input type="checkbox"/> <sup>2</sup> ADEQ <input type="checkbox"/> <sup>4</sup> Other (List all Notified)	<b>PRIORITY TWO:</b> <input checked="" type="checkbox"/> Severe to moderate Damage	<b>PRIORITY THREE:</b> <input type="checkbox"/> Routine Operations
<b>ICS ACTIVATED:</b> <input type="checkbox"/> Document Call Down List and FEMA requirements		

(√ Check One)

**RECEIVED VIA:** ☐ E-MAIL ☒ TELEPHONE ☐ MESSENGER ☐ OTHER

**MESSAGE:** Lisa Wayne contacted Christine Medley to inform her that a suspected UST leak was underway at the Fort Mojave Gas Station in Mohave Valley. Lisa was given this information by personnel at that service station. She informed EPO that this service station hasn't received a "passing score" by UST inspectors since the end of June 2013.

**TYPE OF INCIDENT:** ↓ **LOCATION:** Fort Mojave Gas Station & Smoke Shop, 8501 S Hwy 95, Mojave Valley - 34°54'32.69"N 114°35'54.40"

☐ Water ☐ Waste ☐ Air ☒ Hazard Spill ☒ Toxic Substance ☐ Wild Fire ☐ Other

**CITE CODE VIOLATION:** Unknown until EPO and EPA inspection is complete.

**INCIDENT DESCRIPTION:** EPO personnel were contacted by the Tribe's Economic Development Director (Lisa Wayne) to report a possible ongoing fuel leak at the Fort Mojave Gas Station / Smoke Shop. Both Russell Ray and Christine Medley drove to the site and encountered a private firm contracted to test the station's UST and make a determination [of] whether or not a fuel leak occurred. That firm (**WestTest** Inc. of Phoenix) assigned UST specialists, represented by James Groft, to the leak incident. EPO was received also by gas station employee [Harry Aceves]. WestTest tested extensively the gas station's UST and determined that a fuel leak was indeed ongoing. With several modes of measurement and detection equipment, WestTest was able to determine that the rate of fuel seepage was 1.5 gallons per minute by inserting a monitoring device through a manhole at the SW corner of the UST section. They also determined that in all, roughly 200 gallons of fuel had leaked from the UST over a period of about two weeks (since the date of the last UST compression test [which failed]). Mr. Groft informed EPO that the UST containing premium fuel contained vertical cracks adjacent to each indentation of the ribbed-designed tank. He told EPO that because the fuel tank was single-lined rather than double-lined, a leak was inevitable. In addition, the age of the UST (approximately 25 years since its installation) led him to believe that the cause of this incident is multi-faceted, especially in one that stores high-octane fuel (as opposed to ones that store lower octane-rated unleaded fuel). Mr. Groft compared the leaking UST to many others throughout the state of Arizona where single wall-fiberglass construction was the norm. Roughly 20% of all USTs in Arizona have failed because of minimal construction standards at the time (up through the late 1980s). Mr. Groft recommended that the gas station immediately pump the content of the UST containing premium gasoline into an adjacent UST that contains regular unleaded fuel (subsequent to storing all unleaded fuel in another (adjacent UST) whose capacity (this morning) was sufficient to store excess unleaded fuel.

**INJURIES:** ☐ YES ☒ NO **TYPE:** N/A

**UNKNOWN:** \_\_\_\_\_

**PROPERTY DAMAGE:** ☒ YES ☐ NO **TYPE:** Leaking **AMOUNT:** 200 Gallons total

underground  
storage tank –  
petroleum  
hydrocarbon  
contamination

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1.5 gallons/minute

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**ACTION TAKEN:** EPO personnel drove to that service station to assess damage and verify UST Pressure and leakage tests, and to meet with personnel representing WestTest. James Groft (WestTest) advised FMIT to take whatever means necessary to remove premium fuel from leaking UST. WestTest conducted several tests to prove that there is indeed fuel seepage, and made a determination that 1.5 gallons was leaked every hour since mid-July. EPO personnel fully documented site damage (reports and photos), then drove to Tribal Administration to meet with Lisa Wayne (Tribal Economic Development Director). EPO personnel advised Ms. Wayne that LUST testing was nearing completion, and repeated information given to them by WestTest – that the leak is ongoing and serious enough to merit immediate remedial action – need to remove the content of the premium fuel UST as soon as possible. EPO also advised Ms. Wayne of the structural problems with the station's UST, and they should be replaced by more structurally sound (modernized) versions. After meeting with Ms. Wayne, the Environmental Operations Manager contacted US EPA in San Francisco for further instruction. EOM spoke with Steve Linder, EPA UST Programs Manager – Mr. Linder advised that we IMMEDIATELY remove the content of the LUST before completing any documentation (Linder pointed out that other associated activity concerning the LUST can wait. Linder told the EOM that he would have one of his staff members contact him and begin documentation and remediation processes, but stressed the importance of removing the premium fuel immediately – all other activities could wait. He also informed us that we risk substantial economic and environmental damage if we "...even put off emptying the LUST a few hours." EOM contacted EPO's Director (Luke Johnson). By this time of the afternoon (about 2:30 PM) of 8-1-2013, the Tribe authorized immediate Removal the leaking UST's content consequent to the advice of Mr. Johnson and Ms. Wayne. At 3:30, the EOM revisited the LUST site, and found the FMIT had contracted **AzTech Petroleum Services** (Kingman). AzTech's Supervising Technician (Remy Hollombe) and his crew were in the process of pumping all premium fuel from the LUST when the EOM arrived. Mr. Hollombe told the EOM that the LUST contained roughly 4000 gallons of fuel when pumping began. Upon EOM's visit, only 1,400 gallons remained in that tank. Hollombe reported that all (but all few gallons) of premium would be removed upon completion – he estimated the LUST's fuel would be removed by 7:00PM. AzTech hired the firm **Texmo** to bring a fuel tanker to conduct transferral of premium fuel to the empty regular unleaded fuel UST.

**COMPLIANCE ACTION:** (1) EOM visited site to ensure all UST compression tests were conducted in compliance with EPA and ADEQ protocol, (2) Tribal authorities (Luke Johnson and Lisa Wayne) secured Tribal permission to immediately drain the leaking UST only 2-3 upon receiving compression test results, (3) EOM contacted US EPA for further instruction and reporting requirements, and (4) EPA LUST office will contact EPO with further instruction governing remediation (soils and ground water testing, and restoration activity instructions) and all associated reporting. On 8-2-2013, EOM will contact ADEQ to inform them of this incident and seek instruction from them. EOM was promised that reports are forthcoming from both WestTest and AzTech Petroleum, both to be delivered 8-2-2013. Lisa Wayne reported that Tribal authorities have given permission to excavate the UST section of the gas station and remove existing single-walled USTs with updated ones constructed with a double-exterior wall, consequently bringing them up to code (both state and federal).

**CURRENT DISPOSITION:** EOM is waiting for technical reports forthcoming from WestTest and AzTech; EOM will be contacted by US EPA with remediation and reporting instructions.

Update – US EPA R9 LUST Office (Tess Salire) contacted EOM with instructions: (1) send an incident description letter to EPA (including our response time), (2) provide a timeline of our response actions, (3) provide a schedule of remediation action leading up to closure of this incident case file. EOM informed EPA that all will be fulfilled 8-2-2013, but a schedule of remediation activity will be provided to EPA 8-5-2013. Ms. Salire will e-mail templates and instructions to EOM today (8-2-2013).

**INVESTIGATOR:** Russell Ray, FMIT EPO

**DATE:** 8-1-2013

<sup>1</sup> EPA Call 1-800-424-8802 (National Response Center) Ask to be transferred to the EPA Duty Officer, describe incident on this page.

<sup>2</sup> ADEQ Call 602-771-2330 for reporting and requesting assistance in Arizona. Call 602-233-2212 for reporting transportation spills.

<sup>3</sup> Arizona Poison Center: 1-800-362-0101      California Poison Center: 1-800-876-4766

<sup>4</sup> Mohave Valley Fire Dept (for HAMAT spills or wild fires) 928-768-9113